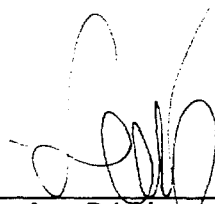


CERTIFICATE

I, Lori A. Dilks, the officer before whom the deposition of DOUGLAS DIDYOUNG was taken, do hereby certify that DOUGLAS DIDYOUNG, the witness whose testimony appears in the foregoing deposition, was duly sworn by me on October 22, 1999, and that the transcribed deposition of said witness is a true record of the testimony given by him; that the proceedings are herein recorded fully and accurately to the best of my ability; that I am neither attorney nor counsel for, nor related to any of the parties to the action in which this deposition was taken; and, further, that I am not a relative of any attorney or counsel employed by the parties hereto or financially interested in this action.



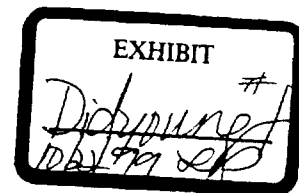
Lori A. Dilks, RPR

Notary Public in and for
the Commonwealth of Pennsylvania

BERKS COURT REPORTING SERVICE

BECHTEL & COLE
FILE COPY

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554



In re Applications of)	MM Docket No. 99-153
)	
READING BROADCASTING, INC.)	File No. BRCT-940407KF
)	
For Renewal of License of)	
Station WTVE(TV), Channel 51)	
Reading, Pennsylvania)	
)	
and)	
)	
ADAMS COMMUNICATIONS CORPORATION)	File No. BRCT-940630 KG
)	
For Construction Permit for a New)	
Television Station to Operate on)	
Channel 51, Reading, Pennsylvania)	

RECEIVED

SEP 28 1999

To: Magalie Roman Salas, Secretary
for direction to
The Honorable Richard L. Sippel
Administrative Law Judge

NOTICE BY ADAMS OF DEPOSITION
UPON ORAL EXAMINATION

Adams Communications Corporation ("Adams") gives notice of its intent to take the deposition of Doug Didyoung, POW/MIA Forget Me NOTs, 555 Raymond Bldg., Muhlenberg Township, Temple, PA 19560, upon oral examination on Friday, October 22, 1999, commencing at 11 a.m. at the Comfort Inn, 2200 Stacy Drive, Reading, PA. We anticipate the deposition will be concluded within one hour. This is one of several depositions being taken during the period Wednesday, October 20, 1999, through Saturday, October 23, 1999. If the date and time cannot be accommodated, please contact Simone Parrish at 202-833-4190 collect, who will make an effort to revise the schedule to accommodate you. The subject of the deposition is your knowledge of programming and operations of station WTVE, channel 51, during the period August

1, 1989 through July 31, 1994. The deposition will be taken before a court reporter.

Respectfully submitted,

Gene A. Bechtel / HFC
Gene A. Bechtel
Harry F. Cole

Bechtel & Cole, Chartered
Suite 250, 1901 L Street, N.W.
Washington, D.C. 20036
Telephone 202-833-4190
Telecopier 202-833-3084

Counsel for Adams Communications
Corporation

September 28, 1999

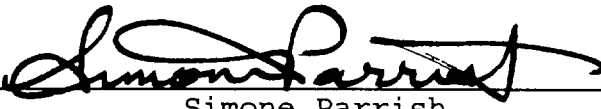
CERTIFICATE OF SERVICE

I certify that I have this 28th day of September 1999 caused copies of the foregoing NOTICE BY ADAMS OF DEPOSITION UPON ORAL EXAMINATION to be hand delivered to the offices of the following:

The Hon. Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

James Shook, Esq.
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Thomas J. Hutton, Esq.
Holland & Knight, L.L.P.
Suite 200, 2000 K Street, N.W.
Washington, D.C. 20006
Counsel for Reading Broadcasting, Inc.

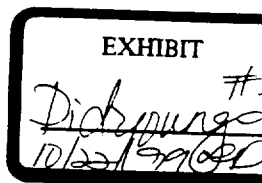
A handwritten signature in black ink, appearing to read "Simone Parrish", is written over a horizontal line.

Simone Parrish
Legal Assistant

SUBPOENA

ORIGINAL - To be executed by the person who effects service and returned to the Secretary of the Commission.

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION



IN THE MATTER OF
READING BROADCASTING, INC.

For Renewal of License for
Station WTVE(TV), Channel 51,
Reading, Pennsylvania

MM Docket No. 99-153

THE PRESIDENT OF THE UNITED STATES OF AMERICA

To Doug Didyoung, POW/MIA Forget Me Nots, 555 Raymond Bldg.,* GREETINGS:
Muhlenberg Township, Temple, PA 19560

YOU ARE HEREBY ORDERED under penalty of law to appear before the Federal Communications Commission or
any duly authorized notary public at the Comfort Inn, 2200 Stacy Drive
(Name and official title of person authorized to take depositions)

in the city of Reading, PA on the 22nd day of October, 19 99,

at 11 o'clock A.M., of that day, to testify in the above-captioned matter and to bring with you and to
produce then and there the following books, papers, and documents: See attached

READING EXHIBIT 37
PAGE 22

*The address listed is that provided by Reading Broadcasting, Inc.
Revisions may be made at a later date to facilitate service.

BY ORDER OF THE FEDERAL COMMUNICATIONS COMMISSION, this twenty-eighth day of
September, 19 99.

Richard L. Hyslop
(Official Title)

Administrative Law Judge

NOTICE: - Witness fees and mileage for attendance under this subpoena for service hereof are to be paid by the party at whose instance the witness is subpoenaed, and every copy of this summons for the witness must contain a copy of this notice.

Service of subpoenas may be made by any citizen of the United States over the age of 18 years who is competent to be a witness, and is not a party to or in any way interested in the proceeding.

PROOF OF SERVICE ON REVERSE SIDE.

FCC Form 766
October 1985

Attachment 1:

DOCUMENTS TO BE PRODUCED

All documents of any kind or description relating to the deponent's knowledge of or familiarity with the operations, including the programming, of Station WTVE(TV), Reading, Pennsylvania, during the period August 1, 1989 through July 31, 1994.

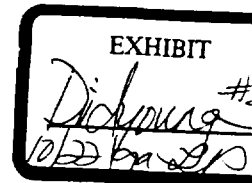


Prisoners Of War/Missing In Action

Forget-Me-Nots, Inc.

P.O. Box 12673
Reading, PA 19612-2673

STATEMENT OF PURPOSE



The Prisoners Of War/ Missing In Action Forget-Me-Nots, Inc., were founded as a non-profit organization on 23 February 1989, as the Berks County Chapter, National Forget-Me-Not Association for POW/MIAs, Inc. Members are concerned citizens as well as veterans. They are dedicated towards promoting the awareness and education of the public to the plight of those still missing in action from all conflicts. In January, 1992 we reorganized as the Prisoners Of War/ Missing In Action Forget-Me-Nots, Inc. Pa., in order to expand our influence in Pennsylvania, and establish our own identity.

The goals of the organization were based on those ideals of the family of Peter Cressman, who became one of those missing in action from the Vietnam conflict. His mother's love and the dedication she and her family have shown, inspired us locally to do our part for all those like Peter, still missing in action.

Evelyn Cressman and others, formed the National Association on 28 September 1981. The association has been a living testimony to Sgt. Peter Cressman, U.S.A.F., who was lost on his last mission that day when his EC-47 carrying eight crew members, was shot down over Laos. Intelligence reports indicated that several crew members had survived the crash and had been captured, Members of the crew were reportedly last seen being transported to the North Vietnamese border. Radio monitors intercepted a broadcast message ordering that the captives "not be mistreated". This radio message was the last official information provided to Sgt. Cressman's family.

Peter Cressman is not the sort of man that America can afford to leave behind. While stationed at DaNang for a volunteer tour of duty, Peter had spent most of his free time at the Sacred Heart Orphanage. The orphanage was desperate for funds and the children's poverty was heart rending. (cont. next side)

READING EXHIBIT 37
PAGE 24

When one American is not worth the effort to be found, we as Americans have lost.

NATIONAL ALLIANCE OF FAMILIES

FOR THE RETURN OF AMERICA'S MISSING SERVICEMEN AND WOMEN
WW II-KOREAN WAR-COLD WAR-VIETNAM WAR-PERSIAN GULF
P.O. BOX 40327-BELLEVUE, WASHINGTON 98015-4327
TEL. (206) 861-1499 FAX: (206) 861-1499

FILM KNOWN AS "OUTRAGE"

U.S. GOVERNMENT COVER-UP EXPOSED PROOF VIETS HELD HUNDREDS OF U.S. POWS MANY REPORTED STILL ALIVE IN LATE 1980s



PROOF OR YOUR MONEY BACK

Did the U.S. cover up proof that hundreds of American POWs were held in Southeast Asia long after the war? Citing previously secret U.S. Intelligence documents, this video settles the question once and for all. See the shocking evidence in a 2-hour videotaped intelligence briefing by former U.S. Congressman Bill Hendon (R-NC). Mr. Hendon was a member of the U.S. House POW/MIA task force, a Pentagon consultant on POW/MIA affairs and an intelligence investigator assigned to the Senate select committee on POW/MIA affairs. America's leading expert on the Vietnamese prison system, he has appeared on *60 Minutes*, *Larry King Live*, *20/20*, *Today*, *Good Morning America*, *Donahue*, *Dateline NBC*, *Unsolved Mysteries* and international television throughout the world.

MONEY BACK GUARANTEE

After viewing this 2-hour videotaped intelligence briefing, if you are not totally convinced that (1) the Vietnamese government held hundreds of U.S. POWs in prison long after the war; and (2) the U.S. Government knew about it and covered it up, simply return this tape for a full \$19.95 refund, no questions asked.

CALL OUR TOLL FREE NUMBER TO ORDER YOUR VIDEO TODAY BY CREDIT CARD

1-800-POW-MIAS

MAIL ORDERS: POW PUBLICITY FUND P.O. BOX 65500 WASHINGTON, D.C. 20035

THE COST IS \$19.95 PLUS \$4.00 SHIPPING AND HANDLING

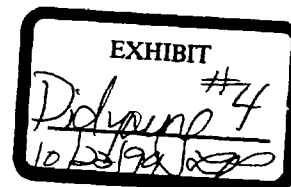
SEE THIS EXPLOSIVE INTELLIGENCE BRIEFING THAT PRESIDENT CLINTON'S ADVISORS **REFUSED TO SEE** AT THE WHITE HOUSE ON SATURDAY, JANUARY 15, 1994

THE DECLASSIFIED U.S. GOVERNMENT INTELLIGENCE IN THIS BRIEFING WAS ACQUIRED FROM THE DEPARTMENT OF DEFENSE, THE CIA, THE NATIONAL ARCHIVES AND THE LIBRARY OF CONGRESS IN WASHINGTON, D.C.

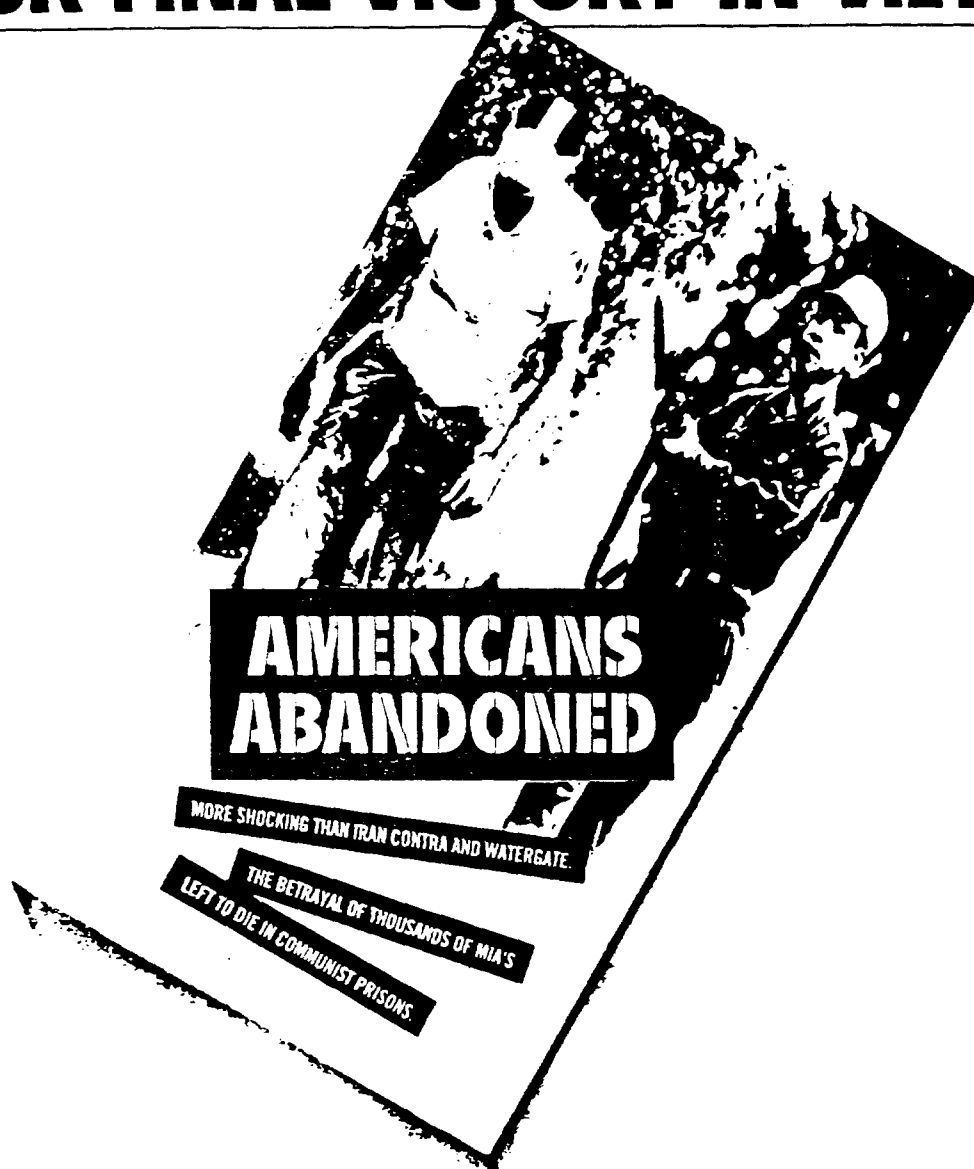
©1994 THE POW PUBLICITY FUND

AS ADVERTISED IN THE NEXT ISSUE OF VIETNAM MAGAZINE
DUE OUT MID-AUGUST 1994

READING EXHIBIT 37
PAGE 25



WITH THIS WEAPON WE'LL WIN OUR FINAL VICTORY IN VIETNAM.



EXHIBIT

Didymus #2
10/22/82

In 1973, the last American POWs came home from Vietnam. Or did they? The video *AMERICANS ABANDONED* reveals important evidence that some American POWs may still be alive in Southeast Asia and that others were taken to the Soviet Union. This video tells of similar U.S. POW tragedies after World War II and Korea and raises troubling questions about the U.S. Government's commitment to American servicemen held captive in foreign lands. *AMERICANS ABANDONED* shows the heroic action of POW/MIA families and explains what you can do to help expose the truth and get the POWs home. Order your copy of *AMERICANS ABANDONED* and play an important part in this great American victory. All proceeds and contributions benefit the MIA cause.

Please send my *AMERICANS ABANDONED* video to:

READING EXHIBIT 37

PAGE 26

Please enclose \$29.95 + \$3.05 shipping & handling

☐ Check Enclosed

☐ Visa

☐ Mastercard

CARD NUMBER

EXPIRATION DATE

SIGNATURE

NAME

STREET ADDRESS

CITY

STATE

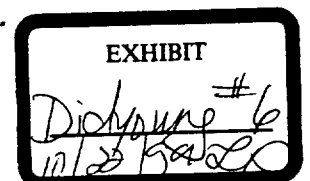
ZIP

Send to: American Defense Institute, 1055 North Fairfax Street, Second Floor, Alexandria, VA 22314

**WTVE-TV 51
READING, PENNSYLVANIA
FOURTH QUARTER 1992**

SECTION I

Non-Broadcast Public Service Efforts



TV51

WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: AMERICANS ABANDONDED

Length: 58:30

11/07/92

11:00:00A-11:58:00A

12/24/92

06:00:00P-06:58:30P

AFFIDAVIT 92

**READING EXHIBIT 37
PAGE 28**

TV51

WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

Title: AMERICANS ABANDONED

Length: 58:30

11/07/92

11:00:00A-11:58:00A

12/24/92

06:00:00P-06:58:30P

AFFIDAVIT 92

**READING EXHIBIT 37
PAGE 29.**

WTVE-TV 51
READING, PENNSYLVANIA

FIRST QUARTER 1993

(January 1-March 18, 1993)

SECTION I

Non-Broadcast Public Service Efforts



Prisoners Of War/Missing In Action
Forget-Me-Nots, Inc.

P.O. Box 12673
Reading, PA 19612-2673

23 March 1993

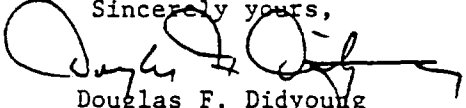
WTVE TV-51
1729 N. 11-th Street
Reading, Pa. 19604

Attn: Dan Bendetti

Dear Dan:

I apologize for not writing sooner, but all good things take time. I just wanted to write a few lines in praise and thanks for the efforts by you and the staff at TV-51. We appreciate your finding air time for the POW/MIA video which we have been promoting. It was most beneficial to be able to have it run last November near Veterans Day. We received some inquiries from this showing, which proves people do still care. Feel free to pass this praise along to whomever you feel should be thanked. I myself can't say enough about your professional approach and help in making the lead in for the video. Your station will always be tops with us for its' public service approach to this community. THANKS AGAIN.

Sincerely yours,



Douglas F. Didyoung
Executive Director

READING EXHIBIT 37
PAGE 31

When one American is not worth the effort to be found, we as Americans have lost.

A Non-profit, Non-political, Volunteer Group, Duly Registered in the Commonwealth of Pennsylvania, Dedicated Towards a Full Accounting of POW's and MIA's

ISSUES AND PROGRAMS REPORT
FOURTH QUARTER
1993

WTVE-TV 51
1729 NORTH ELEVENTH STREET
READING, PENNSYLVANIA 19604

COMPILED BY:
GEORGE MATTMILLER
OCTOBER, 1993

"Americans Abandoned"

The thrust of the program is that MIA's are still alive in Vietnam, and that the U.S. must never lose sight of this, nor turn its back on them. In order to give the one hour program greater meaning, WTVE worked closely with Doug Didyoung, President of the Reading chapter of Prisoners of War/Missing in Action. Mr. Didyoung came into the studio to cut a two minute opening that brought home the need for continuing efforts that must be made on behalf of the MIA's. The wraparound also gave local information for viewers to contact the forget-me-not's for more information about how they can become involved.

Veterans of Foreign Wars

Veterans of Foreign War wish all families across the country and throughout the world a prosperous and bountiful Thanksgiving and to give thanks for what people have.

Soldier's Greetings

Local soldier's greet family and friends in the local viewership radius wishing their family and friends a Merry Christmas from where they are stationed all throughout the world.

21). ISSUE: WEATHER

Daily Weather

WTVE-TV 51 compiles information from the National Weather Service in order to edit, script and produce thirty-second daily inserts.

22). ISSUE: WOMEN'S CONCERNS

Berks Women in Crisis

WTVE-TV 51 produced this thirty-second Public Service Announcement that shows a distressed woman at a video arcade. The PSA. advises local battered women where to go for help.

James A. Michener Art Museum - "Women's Work"

"Why Isn't Housework Glamorous?" is a fifteen-second Public Service Announcement incorporating humor into the conflicting and unrealistic demands on today's women. The purpose of the PSA. is to alert viewers to the sculpture exhibition "Women's Work: Sculpture by Rhonda Roland Shearer" at the non-profit James A. Michener Art Museum in Doylestown, Pennsylvania. The PSA. was created by the sculptor, Rhonda Roland Shearer.

**WTVE-TV 51
READING, PENNSYLVANIA
FOURTH QUARTER 1992**

SECTION I

Non-Broadcast Public Service Efforts

"Americans Abandoned"AFFIDAVIT "92"

The thrust of the program is that MIA's are still alive in Vietnam, and that the U.S. must never lose sight of this, nor turn its back on them. In order to give the one-hour program greater local meaning, WTVE worked closely with Doug Didyoung, President of the Reading chapter of Prisoners of War/Missing in Action. Mr. Didyoung came into the studio to cut a two-minute opening that brought home the need for continuing efforts that must be made on behalf of the MIA's. The wraparound also gave local information for viewers to contact the Forget-Me-Nots for more information about how they can become involved.

"Helping Veterans"AFFIDAVIT "93"

This 30-second P.S.A., sponsored by the Veterans Administration, advises Veterans about Veterans Administration Benefits. It tells Veterans to apply from the Department of Veterans Affairs.

21). ISSUE: VOTING

"Kick Non-Voting"AFFIDAVIT "94"

The American Legion sponsors this 30-second P.S.A. urging Americans to get out and vote. The spot shows citizens making up excuses for reasons why they won't go to the polls. A man states that he doesn't get paid to vote, so why should he bother. An elderly lady comes up from behind and kicks him. The point of the P.S.A. is to kick the non-voting habit and that everyone should exercise their right to vote.

"Flag"AFFIDAVIT "95"

The 1992 Register and Vote Campaign sponsors this 30-second P.S.A. urging Americans to get out and vote. The spot speaks of studies showing only fifty per cent of the public every votes. It urges Americans to issue their right to vote, using the fifty stars on the flag as a symbol for the fifty per cent who do vote.

22). ISSUE: WEATHER

"Daily Weather"AFFIDAVIT "96"

The station compiles information from the National Weather Service and edits, scripts and produces 30-second inserts daily.

23). ISSUE: WOMEN'S CONCERNS

"Berks Women in Crisis"AFFIDAVIT "97"

WTVE produced this 30-second P.S.A. that advises local battered women where to go for help.

TV51

WTVE • Reading Broadcasting, Inc.

This is to certify that WTVE-TV51 aired the following Public Service Announcement at the below dates and times:

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11/07/92

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12/24/92

06:00:00P-06:58:30P

AFFIDAVIT 92

**READING EXHIBIT 37
PAGE 36**

**Exhibit 38 DEPOSITION OF JOAN BREISCH
OCTOBER 22, 1999, 1:55 P.M.**

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re: Applications of : MM Docket No. 99-153
READING BROADCASTING, INC. :
For Renewal of License of : File No. BPCT-940407KF
Station WTVE (TV), Channel :
51, Reading, Pennsylvania :
and : File No. BPCT-940630KG
ADAMS COMMUNICATIONS :
CORPORATION :
For Construction Permit for :
a New Television Station :
to Operate on Channel 51, :
Reading, Pennsylvania :

DEPONENT: JOAN BREISCH

DATE AND TIME: Friday, October 22, 1999
at 1:55 p.m.

LOCATION: Comfort Inn
2200 Stacy Drive
Reading, Pennsylvania

Berks Court Reporting Service
By: Lori A. Dilks, RPR
12 Pacific Avenue
Sinking Spring, Pennsylvania
(610) 678-9984

COPY

1 APPEARANCES:

2 HOLLAND & KNIGHT, LLP
 3 By: Thomas J. Hutton, Esquire
 4 2100 Pennsylvania Avenue, N.W.
 Suite 400
 Washington, D.C. 10037-5564

5 Representing Reading Broadcasting, Inc.

6 BECHTEL & COLE, CHARTERED
 7 By: Gene A. Bechtel, Esquire
 8 1901 L Street, N.W., Suite 250
 Washington, D.C. 10036

9 Representing Adams Communications

10

11

12

13 I N D E X

14

14	<u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
15	Joan Breisch	Mr. Bechtel	3
16		Mr. Hutton	5

17

17		<u>EXHIBITS</u>	
18	<u>NUMBER</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
19	Breisch 1	Notice of Deposition	3
20	Breisch 2	Subpoena	3
21	Breisch 3	Issues and Programs Report	6

22

23

24

25

11 1 P R O C E E D I N G S

12 2 JOAN BREISCH,

3 was called as a witness and, having been first duly
4 sworn by the Reporter-Notary Public, was examined and
5 testified as follows:

6 BY MR. BECHTEL:

7 Q. For the record, would you state your name
8 and residence address, please.

9 A. Sure. My name is Joan M. Breisch, and I
10 live at 99 Burning Tree Lane, Reading, Pennsylvania,
11 19607.

12 Q. And my name is Gene Bechtel. I'm counsel
13 for Adams Communications Company, and you know Mr.
14 Hutton who's counsel for Reading Broadcasting Company.

15 If my questions are unclear, please say
16 they're unclear. If Mr. Hutton interjects after I've
17 asked a question, wait until we get through talking. If
18 you need a break, let us know.

19 A. Fine.

20 (Whereupon, the Reporter marked the
21 following exhibits for identification: Breisch 1,
22 Notice of Deposition; Breisch 2, Subpoena.)

23 BY MR. BECHTEL:

24 Q. Is Exhibit 1 a Notice to take this
25 deposition that you received in the mail?

1 A. Yes.

2 Q. And Exhibit 2, is that a Subpoena that you
3 received?

4 A. Yes.

5 Q. Exhibit 2 calls for you to look and see if
6 you have any documents concerning Channel 51 for a
7 five-year period. Do you have any such documents?

8 A. I only have one thing that I could find
9 looking through my calendars over the last few years.
10 Now, I didn't check for the entire year. The only time
11 I checked anything was toward the end of the year, like
12 September on, when we would normally do something for
13 Buck a Book.

14 May I also make a correction here? I'm not
15 the Executive Director of the Berks County Literacy
16 Coalition but, rather, the Executive Director of the
17 Literacy Council of Reading-Berks. There is some
18 confusion because it's so close.

19 The only thing I found was that we did a
20 presentation 12/18/96 at 10 o'clock in the morning with
21 four members of our group. When I say group, these
22 people are members of the Board of Directors and myself.
23 And we did a 30-second PSA and a one-minute spot for
24 Buck a Book. That's the only thing I have actually
25 written down. But we've done a couple of other things